

UNITED STATES DISTRICT COURT
DISTRICT OF MASSACHUSETTS

C.A. NO. 04-CV-11193-NG

SHAWN DRUMGOLD,)
)
Plaintiff)
)
vs.)
)
CITY OF BOSTON, ET AL.,)
)
Defendants)
)

JOINT MOTION FOR EXTENSION OF PRETRIAL DEADLINES

The parties respectfully request that the Court allow a **brief** extension of time on the pretrial order in this matter. As grounds therefor, the parties state that due to the trial schedule of plaintiff's counsel, plaintiff requested additional time within which to provide their expert report. Plaintiff produced his expert report late on the afternoon of August 16, 2007 (seventeen days after the deadline of July 31). Plaintiff's counsel agreed that Defendants would likewise have additional time to provide their expert report. See Exhibit A, letter of Michael Reilly dated August 16, 2007.

The parties therefore respectfully request that the Court allow them additional time to complete pretrial events. The Defendants request that they be granted until **September 30** to file their expert reports (anticipating scheduling difficulties with regard to the Labor Day and end of summer vacations), with summary judgment motions filed by **October 31**, and any responses or oppositions thereto by **November 30, 2007**.

Respectfully submitted,

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RICHARD WALSH,

By his attorney,

By his attorney,

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